

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

**SIXTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM  
(UPS/USPS-T28-39 through 40)**

(September 17, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Crum (UPS/USPS-T28-39 through 40).

Respectfully submitted,



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**INTERROGATORIES FROM UNITED PARCEL SERVICE  
TO UNITED STATES POSTAL SERVICE WITNESS CRUM**

**UPS/USPS-T28-39.** Please refer to Exhibit F, page 1 of 2 of USPS-T-28.

(a) Please explain all differences between the costs for mail processing at destination BMCs in this Exhibit with those derived by Witness Daniel for DBMC mail in USPS-T-29, Appendix V, pages 10-12.

(b) Please confirm that the costs avoided at the BMC by DSCF mail is being measured against that of DBMC mail. If not confirmed, please explain.

**UPS/USPS-T28-40.** Please refer to page 7 of your direct testimony.

Please confirm that DDU mailers using sacks would have to unload the sacks and dump the sacks without Postal Service assistance. If confirmed, please explain where and how DDU mailers will unload and dump the sacks. If not confirmed, please explain.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in  
accordance with section 12 of the Commission's Rules of Practice.

  
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Stephanie Richman

Dated: September 17, 1997  
Philadelphia, PA